

# **Exhibit B**

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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

BRUCE MACDONALD, Individually and  
 on Behalf of All Others Similarly Situated,

Plaintiff,

v.

DYNAMIC LEDGER SOLUTIONS, INC.,  
 a Delaware corporation, TEZOS  
 STIFTUNG, a Swiss Foundation,  
 KATHLEEN BREITMAN, an  
 Individual, ARTHUR BREITMAN,  
 an Individual, TIMOTHY COOK  
 DRAPER, an individual, DRAPER  
 ASSOCIATES, JOHANN GEVERS,  
 DIEGO PONZ, GUIDO SCHMITZ-  
 KRUMMACHER, BITCOIN SUISSE AG,  
 NIKLAS NIKOLAJSSEN and DOES 1-100,  
 INCLUSIVE,

Defendants.

Case No. 3:17-cv-07095-RS

CLASS ACTION

**PLAINTIFFS' NOTICE OF DEPOSITION  
 OF DEFENDANT DYNAMIC LEDGER  
 SOLUTIONS, INC. PURSUANT TO  
 FEDERAL RULE OF CIVIL  
 PROCEDURE 30(b)(6)**

PLEASE TAKE NOTICE that, pursuant to Rules 30 and 45 of the Federal Rules of Civil Procedure, Plaintiffs in the above-captioned action, by its counsel, will take the oral deposition of Defendant Dynamic Ledger Solutions, Inc. regarding the subject matters set forth in the attached Schedule B, which shall be interpreted in accordance with the definitions and instructions set forth in Schedule A.

The deposition shall commence at 10:00 a.m. on March 1, 2018 at the Berkeley offices of Hagens Berman Sobol Shapiro LLP, or at such other time and location as agreed upon by counsel, and continuing thereafter until completed. The deposition will be recorded by stenographic means.

By February 26, 2018, Defendant Dynamic Ledger Solutions, Inc. shall provide a written designation of the name(s) and position(s) of the one or more officers, directors, or managing agents, or other persons who will be produced to testify on Dynamic Ledger Solutions, Inc.'s behalf concerning the matters set forth in Schedule B. Pursuant to Federal Rule of Civil Procedure 30(b)(6), the person(s) designated by Dynamic Ledger Solutions, Inc. should be prepared to testify to such matters known or reasonably available to Dynamic Ledger Solutions, Inc. The person testifying shall bring to the deposition, or produce beforehand, all documents reviewed, relied upon or considered in preparation of the deposition.

DATED: January 10, 2018

Respectfully submitted,

**HAGENS BERMAN SOBOL SHAPIRO LLP**

By: /s/ Reed R. Kathrein

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**SCHEDULE A**

**DEFINITIONS AND INSTRUCTIONS**

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3 1. “Defendants” “you” or “your” refers to Dynamic Ledger Solutions, Inc., Tezos  
4 Stiftung, Kathleen Breitman, Arthur Breitman, Timothy Cook Draper, Draper Associates, Johann  
5 Gevers, Diego Ponz, Guido Schmitz-Krummacher, Bitcoin Suisse AG, and Niklas Nikolajsen. All  
6 references to the “Breitmans” (plural) refer to both Defendant Kathleen Breitman and Defendant  
7 Arthur Breitman.

8 2. “Communication” or “communications” refers to every manner or means of disclosure,  
9 transfer or exchange of information (in the form of facts, ideas, inquiries or otherwise), whether orally,  
10 electronically, by document, telecopier, mail, personal delivery or otherwise.

11 3. The “Complaint” refers to Plaintiffs’ Class Action Complaint for Violations of  
12 California Corporations Code § 25110 and California’s Unfair Competition Laws (Dkt. No. 1) in the  
13 above-captioned case. All paragraph references herein are to the Complaint.

14 4. “DLS,” or “Dynamic Ledger Solutions” refers to defendant Dynamic Ledger Solutions,  
15 Inc. and its parents, subsidiaries, predecessors, successors, divisions, affiliates, operating units,  
16 controlling persons, controlled persons, officers, directors, employees, representatives or agents.

17 5. “ICO Proceeds” refers to all funds collected via or derived from the Tezos Initial Coin  
18 Offering (the “ICO” or “Tezos ICO”).

19 6. “Putative Class,” “Member of Putative Class,” or “Putative Class Member,” as  
20 defined in ¶1 of the Complaint, refers to:

21 [A]ll persons who purchased Tezos tokens (aka “XTZ”, “Tezzies” or “tez”) by  
22 contributing fiat currency (e.g., U.S. Dollars) or other consideration (including the  
23 blockchain-based digital currencies bitcoin (BTC) and/or Ethereum (“ETC” or  
“ether”)) to the Tezos “Initial Coin Offering” (“ICO”) in July 2017.

24 7. “Tezos Stiftung”, “Tezos Foundation”, or the “Foundation” refers to Defendant Tezos  
25 Stiftung and its parents, subsidiaries, predecessors, successors, divisions, affiliates, operating units,  
26 controlling persons, controlled persons, officers, directors, employees, representatives or agents.

